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DUE
DATERoy Romer, Governor
Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

ACTION

EC&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

| DIST. | LTR | ENC |
|------------------------|-----|-----|
| BURLINGAME, A.H. | | |
| BUSBY, W.S. | | |
| CARNIVAL, G.J. | | |
| CORDOVA, R.C. | | |
| DAVIS, J.G. | | |
| FERRERA, D.W. | | |
| FRAY, R.E. | | |
| GEIS, J.A. | | |
| GLOVER, W.S. | | |
| GOLAN, P.M. | | |
| HANNI, B.J. | | |
| HEALY, T.J. | | |
| HEDAH, T.G. | | |
| HILBIG, J.G. | | |
| HUTCHINS, N.M. | | |
| JACKSON, D.T. | | |
| JELL, R.E. | | |
| QUESTER, A.W. | | |
| MARX, G.E. | | |
| McDONALD, M.M. | | |
| McKENNA, F.G. | | |
| MORGAN, R.V. | | |
| PIZZUTO, V.M. | | |
| POTTER, G.L. | | |
| SANDLIN, N.B. | | |
| BATTERWHITE, D.G. | | |
| SCHUBERT, A.L. | | |
| SCHWARTZ, J.K. | | |
| SETLOCK, G.H. | | |
| STIGER, S.G. | | |
| TOBIN, P.M. | | |
| VOORHEIS, G.M. | | |
| WILSON, J.M. | | |
| Buddy Mark | | |
| HOLLOWELL L | X | X |

September 19, 1994

Mr. Steven W. Slaten
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Industrial Area IM/IRA

Dear Mr. Slaten,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the revised Industrial Area IM/IRA, received August 18, 1994, and is providing the attached comments.

In keeping with our August 9 letter, we are submitting these comments during the public comment period with the understanding that they will be addressed as part of the public comment revision process. Of particular note is our concern that several of the proposed actions are reduced in scope from those that were presented in the preliminary document.

Sincerely,

Joe Schieffelin
Joe Schieffelin, Unit Leader
Rocky Flats IAG Unit
Hazardous Waste Control Program

cc: Bill Fraser, EPA
Regina Sarter, DOE
Mark Buddy, EG&G
Laura Perrault, AGO
Steve Tarlton, RFPU

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| CORRES. CONTROL | X | X |
| ADMIN RECORD/080 | X | 2 |
| PATS/T130G | | |

Reviewed for Addressee
Corres. Control RFP9-26-94 10M
DATE BY

Ref Ltr. #

ADMIN RECORD

DOE ORDER # 5400-1

Colorado Department of Public Health and Environment
Comments
Final Proposed Industrial Area IM/IRA/DD

- 1) Appendix 3.8: This needs to be revised to accurately reflect which units are permitted. The Division considers the term "permitted" to refer to those regulated units which are contained in the existing state RCRA Part B Permit for Rocky Flats. This is limited to container storage areas only. There are no permitted storage tanks (PST) or permitted treatment areas (PTA). We do not consider units that have interim status to be "permitted", and the appendix must be updated accordingly. As currently shown, the appendix implies the majority of units at Rocky Flats are permitted; this is both untrue and misleading.
- 2) Figure 4-4: All the wells in the vicinity of the solar ponds have been omitted. They were on Figure 4-4 in the preliminary document, and several showed significantly elevated contaminant levels. Is there a good reason why they were left out of this version?
- 3) Plate 4-1 is very busy and makes finding the locations of the 11 proposed new wells very difficult. A separate drawing, similar to Figure 4-6 of the preliminary document (but not included in this version), needs to be reinserted.
- 4) Section 4.7.3: What is a well point? The term is never defined.
- 5) Section 5.3.2: The OU2 surface water information is outdated. Collection of SW-61 and SW-132 were discontinued earlier this spring.
- 6) Sections 5.5.1 and 5.5.2: The data gaps identified for base flow and storm conditions are missing the establishment of a mass balance for pollutant loading. Again, these data gaps were identified in the preliminary document but omitted here.
- 7) Section 5.7: The proposed actions for surface water differ significantly from those found in the preliminary document. The primary focus of the preliminary program was to install new surface water sampling stations at the boundary of the 28 drainage sub-basins. The approach put forth in this document falls far short of that goal. Section 5.7.1 presents a stormwater monitoring program at 6 outfalls that are already being, or already have been, monitored as part of the NPDES stormwater requirements; this wasn't even in the original proposal. Additionally, the analytical requirements have been pared down from the entire RFP analyte list to only the NPDES analyte list, which is likely to be too limited to detect COPCs of interest. Section 5.7.2 contains the sub-basin approach, but is scaled down from the original version. The language in Section 5.7.3 is so weak that implementation is not enforceable ("confirmation monitoring *may* be performed.....a seep monitoring program *may* be implemented"). We spent much time eliminating language of this nature from the preliminary document.
- 8) Section 7.3.3: The CDIW analyte list (Appendix 7.2) is too limited. Chart B (Figure 7-5) is a step in the right direction, because it at least considers determining if the water is a hazardous waste.
- 9) Section 7.4: The discussion of the existing water process capabilities is satisfactory. However, one point that jumps out at the reader is the lack of any facility's ability to treat water containing significant levels of the most common chlorinated VOCs found at RFETS: carbon tetrachloride, chloroform, vinyl chloride, TCE, etc. If the OU1 UV/peroxide system, a treatment technology designed specifically to destroy such compounds, is unable in its current configuration to treat more than 5 parts per billion of influent carbon tetrachloride (which is below the current *effluent* levels), then it should be obvious that the system needs to be upgraded. Tailoring the UV system with different lamps is a simple and inexpensive fix.

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10) Section 7.6.2: Along the theme of comment #9 above, the dispositional strategy presented in Figures 7-12 and 7-13 is worrisome. It suggests routing contaminated incidental waters to the sewage treatment plant first. There is a basic flaw in this logic: why is a plant that is designed to treat primarily sewage more effective in handling hazardous constituents than other facilities that were designed especially for them? The Division understands that the OU1, OU2, and 374 facilities were designed for known contaminants at known levels and may not be currently capable of handling the wide range of potential contaminants in incidental waters. Nevertheless, we feel it would be more appropriate to consolidate the treatment capabilities (as DOE is considering) and spend the money to retrofit existing hardware to achieve better hazardous waste treatment capability. It appears to the Division a given that modification to existing water treatment facilities is needed.

We recognize that updating the existing treatment capabilities may be viewed as being outside the scope of this document. Arguments have been forwarded that the OU1 and OU2 facilities have specific missions. However, these missions are changing as the agencies authorize discontinuing treatment of certain influent sources, freeing up significant capacities. Ownership and responsibilities for these newly available facilities can be shaped as needed. As the vehicle to disposition incidental waters across the plantsite, this IM/IRA has the ability to define a new charter for these facilities. DOE should take the opportunity to do so.

11) Section 9.4: Establishment of baseline conditions using control chart statistics is sound for normally distributed data. However, environmental data at or near analytical detection limits is rarely normally distributed. The text does not recommend a method of calculating warning limits for non-normally distributed data.

12) Section 9.5.2: The concept of using grab samples to support the limited real-time parameters is good; the text should define the frequency with which the grab samples will be collected during a D&D activity.

13) Section 11.1, Groundwater implementation plan:

- Should it really take one and a half years to install eleven wells?
- "If required.....if installed.....as necessary": what is the criteria to determine which activities and locations require monitoring? It is up to this decision document to *define* these activities and ensure they happen.

14) Section 11.2, Surface water implementation plan:

- ".....implementation *may* include the following.....". How many times do we have to point out that infirm language has no place in a decision document?
- The implementation schedule contains conflicting statements. The first bullet says outfalls will be *identified* within 18 months; the third bullet says automated sampling stations will be *installed* within 18 months.
- The schedule for installation of the sub-basin stations should be on the same clock as the rest of the monitoring programs this document has identified as needed to fill a gap: within 18 months of the document's approval.
- The assumption that the point of concern for surface water is at the Industrial Area fenceline is supported by the existence of this IM/IRA. It is a little late to be questioning this assumption.

15) Section 11.3, Air implementation plan:

- Should it really take one and a half years to establish a COPC list for a D&D site?

16) Section 11.4, Incidental waters implementation plan:

- Foundation drains should be sampled in the entire industrial area. OU8 encompasses only the 700 area.
- The disposition tasks should also include an evaluation of and upgrades to the existing on-site water treatment facilities (see also comments 9 and 10).